

DOCKET NO. 25004

Complaint and Request of)
EL PASO NETWORKS, LLC,)
For Interim Ruling for Post) BEFORE THE PUBLIC
Interconnection Agreement) UTILITY COMMISSION
Dispute Resolution With) OF TEXAS
Southwestern Bell Telephone)
Company)

DOCKET NO. 25188

Petition of)
EL PASO NETWORKS, LLC,)
For Arbitration Pursuant to)
Section 252(b) of the) BEFORE THE PUBLIC
Communications Act of 1934,) UTILITY COMMISSION
as amended by the) OF TEXAS
Telecommunications Act of)
1996, and PURA for Rates,)
Terms, and Conditions of)
Interconnection Agreement)
with Southwestern Bell)
Telephone)

COPY

ORAL DEPOSITION OF

TRINIDAD TIJERINA

APRIL 10, 2002

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

1 ORAL DEPOSITION of TRINIDAD TIJERINA,
2 produced as a witness at the instance of El Paso
3 Networks, and duly sworn, was taken in the above-styled
4 and numbered cause on the 10th of April, 2002, from 9:06
5 a.m. to 12:04 p.m., before Nancy P. Blankenship, CSR in
6 and for the State of Texas, reported by machine
7 shorthand, at the offices of Hughes & Luce, LLP, 1717
8 Main Street, Suite 2800, in the City of Dallas, County
9 of Dallas, State of Texas, pursuant to the Texas Rules
10 of Civil Procedure and the provisions stated on the
11 record.

12
13
14
15
16
17
18
19
20
21
22
23
24
25

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

A P P E A R A N C E S

FOR EL PASO NETWORKS LLC:
Mr. Stephen Crawford
1001 Louisiana
Houston, Texas 77002
(713) 420-5896

FOR SOUTHWESTERN BELL TELEPHONE COMPANY:
Mr. Floyd R. Hartley
HUGHES & LUCE, LLP
1717 Main Street, Suite 2800
Dallas, Texas 75201

ALSO PRESENT:
Patty Hogue

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

INDEX OF TESTIMONY DESIGNATED HIGHLY CONFIDENTIALBOUND UNDER SEPARATE COVERWITNESS

TRINIDAT TIJERINA

<u>PAGE</u>	<u>LINE</u>		<u>PAGE</u>	<u>LINE</u>
102	2	through	115	1

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

I N D E XWITNESSPAGE

TRINIDAD TIJERINA

EXAMINATION BY MR. CRAWFORD

6

EXAMINATION BY MR. HARTLEY

121

EXAMINATION BY MR. CRAWFORD

125

EXHIBITSIDENTIFIED

1 - Drawing RFI 1-8-472 - CONFIDENTIAL

102

2 - Drawing RFI 1-8-79 - CONFIDENTIAL

102

3 - Drawing RFI 1-8-358 - CONFIDENTIAL

102

4 - Drawing RFI 1-8-450 - CONFIDENTIAL

102

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

P R O C E E D I N G S

TRINIDAD TIJERINA,

having been first duly sworn, testified as follows:

09:06:32 4 MR. CRAWFORD: Just to restate the
09:06:38 5 agreement in terms of objections from defendant's
09:06:42 6 counsel, we will be going by the Texas rules of civil
09:06:45 7 procedure?

09:06:46 8 MR. HARTLEY: That's correct.

EXAMINATION

10 BY MR. CRAWFORD:

09:06:48 11 Q. Okay. Good morning, Mr. Tijerina.

09:06:52 12 A. Good morning.

09:06:53 13 Q. My name is Steve Crawford and I'm a lawyer for
09:06:58 14 El Paso Networks here today. Do you understand that?

09:07:01 15 A. Yes.

09:07:01 16 Q. Okay. Now, do you understand that El Paso
09:07:07 17 Networks and Southwestern Bell Telephone Company, who
09:07:12 18 I'll refer to as SWBT today, are in an arbitration
09:07:16 19 regarding the interconnect agreement in the State of
09:07:17 20 Texas right now?

09:07:18 21 A. Yes, sir.

09:07:18 22 Q. And this deposition is to get some information
09:07:21 23 from you, to find out stuff that you know for use in
09:07:23 24 that proceeding. Do you understand that?

07:25 25 A. Yes, sir.

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

09:07:25 1 Q. Do you understand that this gentleman to your
07:28 2 left is an attorney representing SWBT and is here for
09:07:32 3 you today?

09:07:32 4 A. Yes, sir.

09:07:33 5 Q. Okay. Have you had an opportunity to work
09:07:38 6 with lawyers before today?

09:07:40 7 A. No.

09:07:40 8 Q. Before now?

09:07:41 9 A. No.

09:07:43 10 Q. Let me restate that. I don't want to get into
09:07:46 11 privilege. But let me just be clear that if at any
09:07:51 12 point today you need to take a break and talk with your
09:07:54 13 lawyers, you're free to do so.

09:07:56 14 A. Okay.

09:07:58 15 Q. And I also want you to understand,
09:08:02 16 Mr. Tijerina -- and forgive me if I slip and call you
09:08:07 17 Mr. Trinidad.

09:08:07 18 A. That's all right.

09:08:08 19 Q. -- that if at any point today you need a break
09:08:11 20 for the rest room, coffee or whatever, stretch your
09:08:14 21 legs, just let me know and we will take a break.

09:08:16 22 A. All right.

09:08:16 23 Q. I want you to be comfortable here today.

24 Okay?

08:19 25 Do you understand that you're under oath

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

09:08:24 1 here today?

08:24 2 A. Yes.

09:08:26 3 Q. You're sworn to tell the truth, the whole

09:08:28 4 truth?

09:08:29 5 A. Yes, sir.

09:08:30 6 Q. And you understand what it means to give

09:08:32 7 testimony under oath?

09:08:32 8 A. Yes.

09:08:33 9 Q. All right. Now, today -- sometimes I talk

09:08:38 10 fast. If ever you need me to restate a question, would

09:08:41 11 you agree to stop me and have me restate a question?

09:08:45 12 A. Okay.

09:08:46 13 Q. Do you understand I don't want you to answer

09:08:48 14 anything today that you don't understand?

09:08:49 15 A. Right.

09:08:50 16 Q. So if you don't understand, ask me to clarify?

09:08:53 17 A. Right.

09:08:53 18 Q. All right. Mr. Tijerina, what is your full

09:09:04 19 name?

09:09:06 20 A. Trinidad Tijerina, Jr.

09:09:09 21 Q. Okay. And what is your job title currently?

09:09:14 22 A. I'm a construction manager.

09:09:16 23 Q. Who do you work for?

09:09:18 24 A. Southwestern Bell Telephone.

09:21 25 Q. Construction manager in what area?

09:09:24 1 A. Construction in North Dallas.

09:27 2 Q. Are you in a -- is that part of network, is

09:09:31 3 that part of engineering?

09:09:32 4 A. It's network engineering.

09:09:34 5 Q. Network engineering?

09:09:35 6 A. Yes, sir.

09:09:35 7 Q. In the North Dallas area?

09:09:37 8 A. Yes, sir.

09:09:38 9 Q. Or is that the same department that's in

09:09:40 10 Dallas? Is the region the Dallas region or is it a

09:09:45 11 13-state region or --

09:09:47 12 A. I don't understand what -- what you're getting

09:09:51 13 at.

09:09:51 14 Q. Okay.

09:09:51 15 A. I mean --

09:09:53 16 Q. You're a construction manager for network

09:09:55 17 engineering. Is there a certain region that you're in?

09:09:58 18 A. Dallas north.

09:10:00 19 Q. Dallas north?

09:10:01 20 A. Yes, sir.

09:10:05 21 Q. How long have you been a construction manager?

09:10:09 22 A. Two years.

09:10:15 23 Q. Before you were a construction manager for

09:10:18 24 SWBT, what were you?

10:19 25 A. I was a cable splicer.

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

09:10:26 1 Q. How long have you been a cable splicer for
10:29 2 SWBT?

09:10:29 3 A. I was a cable splicer for 26 years.

09:10:36 4 Q. So help me with the math there. When did you
09:10:40 5 first become a cable splicer for Southwestern Bell
09:10:44 6 Telephone Company?

09:10:45 7 A. 1974..

09:10:47 8 Q. So SWBT has been splicing cable since 1974?

09:10:54 9 A. What do you mean splicing?

09:10:57 10 Q. SWBT has been splicing -- and we will get into
09:11:01 11 the other issues, but SWBT has been splicing some type
09:11:06 12 of wire or cable since 1974, at least?

09:11:09 13 A. Yes, sir.

09:11:10 14 Q. When did SWBT first start splicing fiber optic
09:11:14 15 cable?

09:11:14 16 A. The first fiber I ever spliced was back
09:11:18 17 in 1983.

09:11:19 18 Q. Is that about when SWBT started it, also, or
09:11:23 19 had SWBT been splicing fiber optic cable before then?

09:11:26 20 A. I don't know. I know in 1983 was the first
09:11:29 21 one we did here in Dallas, or that SWBT did in Dallas.

09:11:50 22 Q. So you've been splicing -- I guess, from '74
09:11:57 23 to '83 you were splicing electrical wire?

09:12:01 24 A. Copper wire, yes.

12:02 25 Q. And since '83, you've also been doing fiber

09:12:05 1 optic cables?

12:07 2 A. Yes, sir.

09:12:08 3 Q. Do you also -- from '83 to 2000, did you also

09:12:14 4 splice copper wire, or were you only doing fiber optics?

09:12:24 5 A. I did it, say, from '84 to like '87, we did

09:12:32 6 both.

09:12:37 7 Q. Okay. Am I correct in understanding that

09:12:42 8 copper wire is still spliced today?

09:12:44 9 A. Yes, sir.

09:12:45 10 Q. It has been spliced since SWBT initially

09:12:50 11 deployed it and it is spliced up to today on a regular

09:12:54 12 basis?

09:12:55 13 A. Yes, sir.

09:12:55 14 Q. Okay. Before you were a cable splicer with

09:13:01 15 SWBT, what did you do?

09:13:02 16 A. I was in the military before I hired on with

09:13:06 17 the company.

09:13:06 18 Q. So you hired on directly as a cable splicer?

09:13:10 19 A. As a cable splicer helper, when I got hired.

09:13:15 20 Q. Okay. For those 26 years, were you a cable

09:13:20 21 splicer or did you also have times where you had

09:13:23 22 management responsibilities --

09:13:25 23 A. No, just a cable splicer.

09:13:29 24 Q. Okay. You were never foreman of a crew?

.13:32 25 A. No.

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

09:13:32 1 Q. You never had any management responsibility?

13:34 2 A. Well, when the boss -- our boss went, he left
09:13:38 3 me in charge of the crew.

09:13:40 4 Q. Right?

09:13:41 5 A. Like taking care of the time report and things
09:13:43 6 like that.

09:13:44 7 Q. Okay. But it wasn't official --

09:13:47 8 A. It wasn't official, no.

09:13:48 9 Q. It would just be where the boss couldn't be
09:13:51 10 there and he would say, Trinidad, watch the shop for me
09:13:54 11 or watch the crew while I'm gone?

09:13:57 12 A. Right.

09:14:11 13 Q. You said you're a construction manager now.

09:14:15 14 What does a construction manager do? What does that
09:14:18 15 position entail?

09:14:18 16 A. I have a crew of ten people. I'm a splicing
09:14:24 17 foreman.

09:14:24 18 Q. So now you're a splicing foreman?

09:14:28 19 A. They call us construction managers.

09:14:30 20 Q. Right.

09:14:31 21 A. But we have a -- I have a splicing crew.

09:14:34 22 Q. Do your splicers call you the splicing
09:14:38 23 foreman? Is that how that term comes about?

09:14:42 24 A. That term was used back -- you know, they
14:44 25 changed the designation as time goes by. It used to be

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

09:14:49 1 a splicing foreman, construction manager.

14:51 2 Q. To your best recollection, when did they

09:14:53 3 change that term?

09:14:54 4 A. I can't remember.

09:14:54 5 Q. From splicing foreman to construction manager?

09:14:57 6 A. I can't remember.

09:14:57 7 Q. Was it the last two years, ten years?

09:15:00 8 MR. HARTLEY: Object to the form.

09:15:01 9 Q. Can you -- do you have a ball park?

09:15:03 10 A. You know, I can't -- I don't remember.

09:15:08 11 Q. Okay. Is it something that's been fairly

09:15:10 12 recent?

09:15:14 13 A. All I know, when I got promoted it was

09:15:16 14 construction manager.

09:15:17 15 Q. So two years ago -- at least two years ago it

09:15:20 16 was construction manager?

09:15:21 17 A. Yes. When I got --

09:15:23 18 Q. Okay. So in this -- as construction manager,

09:15:32 19 you are the foreman over a crew of splicers, correct?

09:15:37 20 A. Yes, sir.

09:15:38 21 Q. How many splicers are in your crew?

09:15:40 22 A. I've got nine.

09:15:41 23 Q. And who is the tenth person?

09:15:46 24 A. I don't have a tenth person.

15:48 25 Q. So there's nine splicers and no other people

09:15:50 1 that you oversee?

15:52 2 A. Right.

09:15:52 3 Q. I guess you were promoted to the foreman over
09:15:55 4 the splicing crew because of your 26 years of splicing
09:15:58 5 experience?

09:16:02 6 A. I don't know. I don't know. They asked me if
09:16:05 7 I wanted to be a manager and I said yes.

09:16:07 8 Q. Better pay, right?

09:16:08 9 A. Well, I ain't going to go there.

09:16:16 10 Q. Added responsibility, no more pay, huh. What
09:16:20 11 a deal.

09:16:23 12 Have you hired new splicers into your
09:16:25 13 crew?

09:16:26 14 A. No, sir.

09:16:28 15 Q. Are those splicers people that have already
09:16:31 16 been splicing since you've been promoted?

09:16:34 17 A. Yes, sir.

09:16:34 18 Q. Do you have any splicing helpers or are they
09:16:37 19 all splicers?

09:16:38 20 A. They are all splicers.

09:16:39 21 Q. Okay. In what region does your splicing crew
09:16:47 22 handle?

09:16:47 23 A. Dallas north.

09:16:48 24 Q. Dallas north. What areas are in Dallas north?

16:52 25 A. I have Richardson, City of Richardson, City of

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

09:16:57 1 Addison, part of the City of Dallas, City of Farmers
17:03 2 Branch.

09:17:06 3 Q. Okay. When there's a spot that's open at SWBT
09:17:26 4 and you need another splicer and you bring on a new
09:17:29 5 person to be a new splicer, what training is involved?
09:17:34 6 I want to know a little about the training, how you
09:17:38 7 learn about splicing.

09:17:39 8 A. What do you mean a new person? What do you
09:17:42 9 mean by new?

09:17:43 10 Q. If you need a splicer, an additional splicer,
09:17:46 11 and you don't have one in the wings that's already a
09:17:50 12 trained splicer, how do you bring someone -- how do you
09:17:54 13 educate them as to how to splice?

09:17:56 14 A. Well, there are schools they send them to.

09:18:00 15 Q. Outside schools or inside SWBT schools?

09:18:04 16 A. Inside SWBT schools.

09:18:07 17 Q. They call it a school and it's an internal --
09:18:11 18 a SWBT internal training program?

09:18:14 19 A. It's a training program, yes.

09:18:17 20 Q. Tell me about that program. What does it
21 involve?

09:18:19 22 A. Well, they have an introductory splicing
09:18:24 23 school, which is basic splicing.

09:18:26 24 Q. And how many days does that involve?

.18:32 25 A. Now, if it's a -- somebody they hire off the

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

09:18:36 1 streets, it's a four-week school.

18:39 2 Q. Okay.

09:18:40 3 A. It's a pass or fail school.

09:18:45 4 Q. Have you ever played a role in that school?

09:18:50 5 A. No, sir.

09:18:50 6 Q. Have you heard about it from people that have

09:18:52 7 gone through it?

09:18:54 8 A. I went through it when I got hired.

09:18:56 9 Q. So you have been through that school yourself?

09:19:00 10 A. Yes. It's been in place for --

09:19:03 11 Q. It's probably changed a bit since you were

09:19:05 12 brought on?

09:19:06 13 A. Yes, right.

09:19:07 14 Q. So the introductory training is a four-week

09:19:09 15 school?

09:19:10 16 A. Yes, sir.

09:19:10 17 Q. And that's all done internal to SWBT?

09:19:12 18 A. Uh-huh.

09:19:13 19 Q. Are those eight-hour days?

09:19:15 20 A. Yes.

09:19:16 21 Q. So four weeks, eight-hour days and they teach

09:19:20 22 them how to handle all types of splicing?

09:19:23 23 A. Yes. They go through a whole -- what's

09:19:25 24 involved to be a splicer.

19:26 25 Q. Now, are there written materials involved in

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

09:19:29 1 that that you have to study?

19:30 2 A. Yes.

09:19:31 3 Q. Okay. Is there audio visual, like videotapes
09:19:35 4 you watch or --

09:19:36 5 A. I have no idea. I haven't been to one that --
09:19:38 6 and I haven't had the opportunity to send somebody
09:19:41 7 either, because I haven't -- I don't have no new people
09:19:44 8 yet, so...

09:19:45 9 Q. Right. Is it your understanding at that
09:19:48 10 school that they go over with them the set SWBT methods
09:19:53 11 and procedures for how to properly --

09:19:56 12 A. Yes, sir.

09:19:56 13 Q. -- perform a, say, fiber optic splice?

09:20:00 14 A. They don't teach them fiber optic in that
09:20:03 15 school.

09:20:03 16 Q. Okay. What do they teach them?

09:20:06 17 A. That's just basic splicing, pole climbing, how
09:20:11 18 to set up a manhole, how to open up a copper cable to
09:20:17 19 splice.

09:20:18 20 Q. How to set up the manhole?

09:20:20 21 A. Yes.

09:20:21 22 Q. How to be safe about that?

09:20:23 23 A. Uh-huh.

09:20:24 24 Q. Pump out the air, that type thing?

20:28 25 A. Right.

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

09:20:29 1 Q. And when they come out of there, they're ready
20:32 2 to perform a copper splice in the field?

09:20:35 3 A. Not necessarily. The school they just give
09:20:38 4 them the basic things of -- once they come outside
09:20:43 5 from -- when I was splicing when we have new people come
09:20:46 6 in, they were put on with an experienced splicer --

09:20:49 7 Q. Okay.

09:20:49 8 A. -- for a month or so to be able to learn
09:20:52 9 what's really out there.

09:20:53 10 Q. So there's a training school plus some level
09:20:56 11 of on-the-job training where you're being tutored by a
09:21:02 12 more experienced splicer?

09:21:03 13 A. Right.

09:21:04 14 Q. Now, how does this possible new person learn
09:21:06 15 how to do the fiber optic splicing in the field?

09:21:10 16 A. They send them to a school, also. It's a
09:21:14 17 different school.

09:21:18 18 Q. Also inside SWBT?

09:21:22 19 A. Yes, sir.

09:21:23 20 Q. How long is that school?

09:21:24 21 A. It's a one-week school.

09:21:30 22 Q. So presumably that person would have already
09:21:33 23 gone through the introductory training on copper
09:21:36 24 splicing and then they would at some point get
21:39 25 additional one-week schooling on how to perform a fiber

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

09:21:42 1 optic splice in the field?

21:43 2 A. Yes, sir.

09:21:53 3 Q. And presumably that school teaches them both
09:21:57 4 about mechanical fusion -- mechanical splicing and
09:22:02 5 fusion splicing?

09:22:02 6 A. Yes, sir.

09:22:04 7 Q. Okay. So when they come out of that school,
09:22:09 8 is there also some on-the-job training with another
09:22:17 9 experienced splicer?

09:22:19 10 A. Yes, sir.

09:22:19 11 Q. So at that point they would be free -- once
09:22:21 12 they have their own level of understanding about how to
09:22:24 13 do the field fiber optic splicing, they would then be
09:22:28 14 free to go work on their own as a splicer?

09:22:32 15 A. You would put them out there on their own.

09:22:35 16 Q. You would put them out there on their own?

09:22:38 17 A. If I saw that they were going to be able to
09:22:41 18 handle it.

09:22:42 19 Q. Now, at the fiber optic splicing school inside
09:22:45 20 SWBT, do they teach them the proper SWBT methods and
09:22:49 21 procedures for how to do fiber optic splicing in the
09:22:54 22 field?

09:22:54 23 A. Yes, sir.

09:23:09 24 Q. Do you keep a copy of the methods and
23:12 25 procedures with you or available for your crew in case

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

09:23:14 1 you have a question?

23:15 2 A. Yes, sir.

09:23:16 3 Q. Okay. So those are written down?

09:23:17 4 A. Uh-huh.

09:23:18 5 Q. In a book format or paper format?

09:23:21 6 A. Yes, sir.

09:23:23 7 Q. Okay. Are they pretty good methods and

09:23:33 8 procedures?

09:23:34 9 A. Yes, sir.

09:23:35 10 MR. HARTLEY: Object to form.

09:23:39 11 Q. Do you find them easily understandable?

09:23:46 12 A. Some, yes.

09:23:52 13 Q. Is it your belief as a splicing foreman that

09:23:59 14 if your crew follows these methods and procedures, they

09:24:02 15 should be able to create a good, controlled splice in

09:24:06 16 the field?

09:24:08 17 A. Yes.

09:24:12 18 Q. I want to talk a little about the equipment,

09:24:16 19 and I'm happy that you're -- you had this splicing

09:24:20 20 foreman role. I imagine there's certain splicing

09:24:24 21 equipment that's issued to you personally and also some

09:24:27 22 that may be on the splicing truck or the splicing van;

09:24:31 23 is that correct?

09:24:31 24 A. Yes, sir.

24:33 25 Q. Okay. Explain to me what splicing equipment

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

09:24:38 1 is issued to the splicing crew members on a personal
24:43 2 basis. What would be a typical equipment that they
09:24:47 3 would be issued or have available to them?
09:24:52 4 A. On a personal basis?
09:24:54 5 Q. Right. You know, hand tools for exposing the
09:25:02 6 fiber, that type thing. Or is it all kept on the truck?
09:25:05 7 A. It's all kept on the truck.
09:25:07 8 Q. So the equipment is really truck based?
09:25:09 9 A. Yes, sir.
09:25:11 10 Q. Okay. Let's talk about, then, what's on the
09:25:16 11 truck. In terms of a properly equipped SWBT splicing
09:25:20 12 van -- do you call it a splicing van or a splicing
09:25:25 13 truck?
09:25:25 14 A. Splicing van.
09:25:26 15 Q. In terms of a properly equipped SWBT splicing
09:25:29 16 van, what equipment is supposed to be on that splicing
09:25:33 17 van?
09:25:33 18 A. A fuser, an OTDR, all the hand tools used to
09:25:41 19 open the cable up with, test equipment to test the fiber
09:25:48 20 with.
09:25:57 21 Q. Anything else you can think of?
09:26:00 22 A. Basically that's it really, you know, to
09:26:04 23 splice fiber with.
09:26:05 24 Q. Okay. And when you send your splicers out in
26:17 25 the field, they are supposed to do, say, a field splice

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

09:26:21 1 in a manhole for instance, and I'm only talking about
26:24 2 fiber optic cables for right now. Okay?

09:26:26 3 A. Uh-huh.

09:26:27 4 Q. Is it standard operating procedure that they
09:26:30 5 are supposed to take that splicing van to the location
09:26:33 6 where the splice will be done?

09:26:34 7 A. Yes, sir, if it's in a manhole, yes.

09:26:37 8 Q. Okay. Where else do you do splices besides
09:26:42 9 manholes?

09:26:42 10 A. In a central office.

09:26:44 11 Q. Okay.

09:26:45 12 A. In a building.

09:26:46 13 Q. And those would be -- when you talk about
09:26:50 14 central office and in a building, is that -- basically
09:26:53 15 what you're talking about is when you terminate the
09:26:56 16 cable into something such as an FTF?

09:27:00 17 A. Yes, sir.

09:27:02 18 Q. Okay. We will come back to that, but for
09:27:03 19 right now in terms of talking about field splicing,
09:27:08 20 where you're splicing out in a manhole or aerial or
09:27:15 21 something like that, on the aerial pole, the proper
09:27:16 22 procedure is for them to take the splicing van to the
09:27:22 23 location so they have the equipment with them, correct?

09:27:23 24 A. And they will put the cable inside the van to
25 work on it.

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

1 Q. We'll get to that.

2 A. Okay.

09:27:24 3 Q. The standard operating procedure is for them
09:27:26 4 to take the van with all the proper equipment to the
09:27:30 5 location to perform the splice?

09:27:32 6 A. Right.

09:27:32 7 Q. You mentioned a fuser. What is a fuser?

09:27:35 8 A. That's the set we use to fuse the fibers
09:27:39 9 together before we splice them.

09:27:40 10 Q. Is that that little box about the size of a
09:27:45 11 shoe box, where you put the two fibers one in each end
09:27:48 12 and zap it together?

09:27:49 13 A. Right.

09:27:51 14 MR. HARTLEY: Is zap a term of art?

09:27:59 15 Q. When I say zap, zap means you use some sort of
09:28:04 16 electric arc?

09:28:05 17 A. Electrical current.

09:28:08 18 Q. Right, an arc to melt the glass together?

19 A. Right, uh-huh.

09:28:13 20 Q. What's the name of that box? Is there a brand
09:28:20 21 name or --

09:28:21 22 A. Well, yeah. The one we use is a Fujikora
09:28:26 23 fusion splicer.

09:28:27 24 Q. Is there a model number?

28:29 25 A. There is, but I don't recall it.

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

09:28:32 1 Q. Are those boxes pretty much state of the art
28:36 2 boxes for how to do fusion splicing?

09:28:38 3 A. Yes, sir.

09:28:42 4 Q. Do you know how much one of those boxes costs,
09:28:46 5 the Fujikora fusion splicer?

09:28:49 6 A. \$35,000.

09:28:54 7 Q. So I would imagine you're very careful with
09:28:56 8 that box?

09:28:57 9 A. Oh, yes.

09:28:59 10 Q. Okay. Do you use any other type of fusion
09:29:04 11 splicer?

09:29:05 12 A. We have got some Fujitsu fusion splicers.

09:29:10 13 Q. Okay. They work the same way the Fujikora
09:29:16 14 does?

09:29:16 15 A. Yes, sir.

09:29:23 16 Q. Okay. I imagine you also carry mechanical
09:29:27 17 splicers on the van, too, for emergencies?

09:29:30 18 A. Yes, sir.

09:29:31 19 Q. And that's like a tiny plastic wrap about the
09:29:37 20 size of your hand, right, that wraps around the two
09:29:40 21 fibers?

09:29:42 22 A. No.

09:29:46 23 Q. I've seen some where you put the two fibers in
09:29:48 24 the end and you click them together. What type of
29:52 25 mechanical splicing --

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548

09:29:53 1 A. It's a --

29:55 2 Q. -- gadgets do you use?

09:29:56 3 A. We use the 3M mechanical splice for emergency

09:30:02 4 situations only, and it's a -- the size of a match or

09:30:11 5 something, you know, real small --

09:30:13 6 Q. Right.

09:30:14 7 A. -- where we stick the two fibers in it and

09:30:19 8 twist them.

09:30:20 9 Q. Smaller than a cigarette?

09:30:21 10 A. Oh, yes.

09:30:22 11 Q. And that's for emergencies only?

09:30:24 12 A. Yes, sir.

09:30:25 13 Q. That is not the proper way, according to SWBT

09:30:29 14 policy, to go about fusing two fibers together?

09:30:33 15 A. Right.

09:30:33 16 Q. SWBT policy is to use fusion splicing --

09:30:37 17 A. Yes, sir.

09:30:37 18 Q. -- as the proper standard for effectuating a

09:30:40 19 splice in the field?

09:30:42 20 A. Yes, sir.

09:30:46 21 Q. Okay. You also mentioned OTDR. What does

09:30:52 22 OTDR stand for?

09:30:53 23 A. Optical time domain reflectometer.

09:30:58 24 Q. Reflectometer?

31:01 25 A. Yes, sir.

DICKMAN DAVENPORT, INC.

(214) 855-5100 www.dickmandavenport.com (800) 445-9548